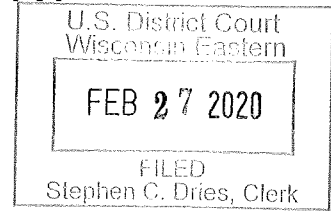


# UNITED STATES DISTRICT COURT

## EASTERN DISTRICT OF WISCONSIN



UNITED STATES OF AMERICA

v.

### CRIMINAL COMPLAINT

CASE NUMBER: 20-M-632

KAMORI D. KEYS  
(DOB: 09/22/1993)

I, Katie J. Keuler, the undersigned complainant, being duly sworn, states the following is true and correct to the best of my knowledge and belief. That on or about February 14, 2020, in the State and Eastern District of Wisconsin, Kamori D. Keys, did commit violations of Title 18, United States Code, Section 1029(a)(3) possession of counterfeit or unauthorized access devices, Title 18, United States Code, Section 1029(a)(1) using counterfeit access devices, Title 18, United States Code, Section 1029(a)(5) Illegal transactions with an access device, and Title 18, United States Code, Section 1028A(a)(1) Aggravated Identity Theft.

I further state that I am a Detective Sargent with the Town of Grand Chute Police Department, and this complaint is based on the following facts:

Please see the attached affidavit.

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

  
\_\_\_\_\_  
Signature of Complainant  
Katie J. Keuler

Sworn to before me and subscribed in my presence,

February 27, 2020  
Date

at Green Bay, Wisconsin  
City and State

The Honorable James R. Sickel  
United States Magistrate Judge

Name & Title of Judicial Officer

  
\_\_\_\_\_  
Signature of Judicial Officer

Your affiant is employed as a sworn law enforcement officer with the Town of Grand Chute Police Department in Grand Chute, Wisconsin, and has been for approximately 11 years. Your affiant is currently assigned to investigate, among other things, financial and identity theft crimes.

On Friday, February 14, 2020, at approximately 2:30 p.m. Sgt. Dave Lund with the City of Appleton Police Department was dispatched to a fraud complaint tied to Community First Credit Union (CFCU) located at 509 N Richmond Street Appleton, Wisconsin, State and Eastern District of Wisconsin. Sgt. Lund spoke with S. J., Senior VP with CFCU. She explained that they had several customers who were contacted via phone by someone posing to be with the Credit Union. She explained that the customers were tricked into giving banking information and then found money had been taken from their accounts via ATM machines.

Sgt. Lund contacted Investigator Jackie Gleiss of the City of Appleton Police Department as he knew she was familiar with fraud investigations of this kind. Investigator Gleiss followed up and spoke with S.J. She advised that money had been taken out from an ATM at the North Richmond branch and the Greenville branch both located in the State and Eastern District of Wisconsin. S.J. estimated that the Credit Union was out \$10,000 in total at this point. S.J. added that the last transaction had just happened about 10 minutes prior to her calling the police, at the Greenville location.

Investigator Gleiss asked S.J. if she had any images of the suspect and vehicle, and she said she did. Investigator Gleiss asked if she could send them to her and Investigator Gleiss would push them out to Appleton, Grand Chute and Outagamie County law enforcement. Investigator Gleiss received an e-mail from S.J. at 3:12 p.m. telling her the suspect was currently back at the Greenville location. Investigator Gleiss contacted me, Detective Keuler, who started in that direction also requested Outagamie County Sheriff's Office to head to that location. While en route Investigator Gleiss was given a Florida license plate number of "LETP40" as the plate on the suspect vehicle according to an employee obtaining it. This information was also provided to responding units.

At approximately 2:46 p.m., I was contacted by Investigator Gleiss with the Appleton Police

Department regarding fraudulent activity occurring at the Community First Credit Union.

Investigator Gleiss forwarded an e-mail with digital images of the suspect who is described as male black wearing dark colored hoodie with gray around the hood area. The vehicle is a four door dark colored Chevy. There were additional images obtained where the suspect would wear his hood up and put on glasses.

A short time later at 3:15 p.m., I was advised by Investigator Gleiss the male suspect was currently at the Greenville Branch location at the ATM. Upon arrival, I was not able to locate the vehicle. I had contacted with S.J. who provided license plate of Florida plate "LETP40" returning to 2016 black four-door Chevrolet to Simplicity Rentals LLC located in Miami, Florida.

I requested patrol officers check local hotels as the male suspect had been at the Greenville branch multiple times throughout the day.

I received a phone call from Grand Chute Officer Lia Vue who advised he located a vehicle matching the description at the Extended Stay 4141 Boardwalk Ct in the Town of Grand Chute, State and Eastern District of Wisconsin. Officer Vue advised the dark colored Chevy was backed into a parking stall so he was unable to obtain the plate but the vehicle was occupied by one male black with glasses who was ducking down when Officer Vue passed him. I informed Officer Vue to maintain visual on the vehicle. The vehicle proceeded to leave the parking lot and officers conducted a traffic stop.

I responded to the location of the traffic stop and the driver was identified as Kamori Dontae Keys from the State of Florida. Kamori was wearing dark colored hoodie with the gray around the hood and the glasses I observed from one of the screenshots obtained from the Greenville branch location. The vehicle Kamori was driving was the 2016 Chevy Malibu with the Florida plate "LETP40." Kamori had his cell phone in his hand when taken into custody and had an active call taking place with unknown individual. Kamori had his GPS activated as the map came up after ending the call.

I responded to the Extended Stay Hotel making contact with the employee who advised Kamori did not have a room registered to him.

The vehicle was towed back to the Grand Chute Police Department and Officer Vue completed an inventory search of the vehicle and located approximately \$17,000 in U.S. currency, a firearm, an additional cell phone, and a card skimming device used to encode and recode magnetic strips commonly found on credit and ATM cards.

Investigator Gleiss was able to obtain a printout from CFCU listing three victims that had money stolen from their accounts via ATM withdrawals. Investigator Gleiss called B.S. who was listed as a victim. Investigator Gleiss spoke to her husband D.S. and he explained she was currently speaking with the bank about the fraud. D.S. told Investigator Gleiss that he happened to go to B.S.'s work that day to have lunch with her. He said while he was with her he received a call from CFCU on his cell phone. When he answered he said the female party identified themselves as being with the fraud department for CFCU. They advised they had seen a questionable charge on B.S.'s card and asked to speak with her. He said that B.S. was told they were seeing two questionable charges that occurred in Atlanta, GA and they wanted to verify if she made them. She said she did not and they said they would file a report. They verified her address and the last four of her social security number by giving that information to B.S. They then asked B.S. to confirm her PIN number which she did by giving it to them. At that point D.S. said the female started to slow things down and he became suspicious about the call. D.S. said they ended the call and contacted the bank immediately and found that \$2,500 had already been removed from their account. At no time did B.S. or D.S. give anyone permission to withdraw money from their joint account.

Pursuant to a search warrant issued by the Honorable Vince Biskupic of the Outagamie County Circuit Court, I accessed Kamori D. Keys' cellphone and discovered approximately 330 credit or debit card numbers which I am aware qualify under federal law as "access devices." I also uncovered messages received by Kamori D. Keys containing credit and debit card numbers, PIN numbers, names of account holders, and addresses. This personal information of account holders constitutes a "means of identification" under federal law. I also uncovered evidence that Kamori

D. Keys had used the stolen credit and debit cards in the states of Louisiana and Florida to obtain money from customer accounts. I am also aware of a customer's account in the State of North Carolina being depleted of approximately \$43,000. I was sent a photograph by law enforcement of the individual making the withdrawals and believe the individual captured on the ATM's security camera to be Kamori D. Keys.

I am aware that financial institutions and, in particular, ATM machines employ the internet and other means and facilities of interstate commerce to conduct financial transactions instantaneously nationally and internationally. Based on my information and belief, under federal law the defendant's conduct had an affect in interstate commerce.

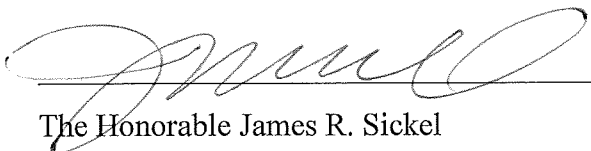
Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that Kamoriu D. Keys, has committed acts in violation of Title 18, United States Code, Section 1029(a)(3) possession of counterfeit or unauthorized access devices, Title 18, United States Code, Section 1029(a)(1) using counterfeit access devices, Title 18, United States Code, Section 1029(a)(5) Illegal transactions with an access device, and Title 18, United States Code, Section 1028A(a)(1) Aggravated Identity Theft

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Detective Sergeant Katie J. Keuler

Town of Grand Chute Police Department

Subscribed and sworn before me this 27 day  
of February, 2020.



The Honorable James R. Sickel

United States Magistrate Judge